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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

RENEE FASSBENDER AMOCHAEV,
DEBORAH ORLANDO, KATHRYN N.
VARNER and IVY SO, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

CITIGROUP GLOBAL MARKETS, INC.,
d/b/a SMITH BARNEY,

Defendant.

No. C-05-1298 PJH

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER MODIFYING CLASS
CERTIFICATION SCHEDULE**

STIPULATION

WHEREAS, Plaintiffs filed an Amended Complaint on November 29, 2006;

WHEREAS, by Order entered December 21, 2006 (Docket No. 115), the Court set an amended class certification briefing schedule in which the deadline for Plaintiffs' Motion for Class Certification was set for February 26, 2007;

WHEREAS, the production of electronic documents is still ongoing;

WHEREAS, given that the production of electronic documents remains ongoing and due to the conflicting schedules of witnesses and counsel for the parties, some depositions will not take place until late April 2007;

WHEREAS, the parties therefore anticipate discovery for class certification continuing until the end of April 2007; and

WHEREAS, the parties and their respective counsel therefore agree that a modification of the class certification schedule is warranted and further agree that the proposed modification will not unduly delay processing the action,

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, that the parties propose the following revised schedule for class certification:

Plaintiffs' Motion for Class Certification	May 25, 2007
Defendant's Opposition to Class Certification	August 3, 2007
Plaintiffs' Reply	September 21, 2007
Class Certification Hearing	October 17, 2007

SO STIPULATED.

1 Dated: February 20, 2007

2 LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP

3
4 By: /s/ Elizabeth A. Alexander
Elizabeth A. Alexander

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3 By: /s/ Jay Cohen

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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 2/22/07

